IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

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SECOND AMENDMENT FOUNDATION, INC., RAINIER ARMS, LLC, SAMUEL W ALLEY, and WILLIAM GREEN,

Plaintiffs,

v.

BUREAU OF ALCOHOL, TOBACCO, FIREARMS AND EXPLOSIVES, REGINA LOMBARDO, in her official capacity as Acting Director of the Bureau of Alcohol, Tobacco, Firearms, and Explosives, UNITED STATES DEPARTMENT OF JUSTICE, and JEFFREY ROSEN, in his official capacity as Acting ATTORNEY GENERAL, U.S. Department of Justice,

Defendants.

Case No. 3:21-cv-00116-B

UNOPPOSED MOTION TO WITHDRAW CERTAIN COUNSEL

Plaintiffs Second Amendment Foundation, Inc., Rainier Arms, LLC, Samuel Walley, and William Green ("Plaintiffs") file this Unopposed Motion to Withdraw Certain Counsel and, in support thereof, would respectfully show as follows:

Attorney Matthew A. Goldstein now asks permission to withdraw as counsel for Plaintiffs. Good cause exists for such withdrawal because, effective October 20, 2022, Mr. Goldstein will no longer work for Clark Hill PLC, the law firm serving as counsel for Plaintiffs in this case. Chad Flores of Beck Redden LLP will continue to represent Plaintiffs in this matter. Defendants are unopposed.

Mr. Goldstein's withdrawal as counsel of record for Plaintiffs will cause no prejudice to any party herein and will neither delay nor interfere with the disposition of this case.

WHEREFORE, Matthew A. Goldstein moves to withdraw as counsel of record for Plaintiffs.

DATED: October 17, 2022 Respectfully submitted,

CLARK HILL PLC

By /s/Matthew A. Goldstein

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Attorneys for Plaintiffs

Certificate of Conference

I hereby certify that I have advised counsel of record for all parties of the filing of this Motion to Withdraw, and none are opposed.

/s/Matthew Goldstein
Matthew Goldstein

Certificate of Service

I hereby certify that on October 17, 2022, I electronically filed and served the foregoing with the Clerk of the Court for the United States District Court for the Northern District of Texas using the CM/ECF system.

/s/Matthew Goldstein
Matthew Goldstein